

Brian Bardwell <a href="mailto:shrian.bardwell@gmail.com">brian.bardwell@gmail.com</a>

## Williamson v. Lorain County, et al. - Defendants' Discovery Responses

Stephen Bosak <sbosak@dooleygembala.com>

Tue, Jun 4, 2024 at 9:16 AM

To: Brian Bardwell <a href="mailto:speech.law">brian.bardwell@speech.law</a>>

Cc: Matthew Dooley <mdooley@dooleygembala.com>, Michael Briach <mbriach@dooleygembala.com>, Amy Joyce <ajoyce@dooleygembala.com>

Brian:

We anticipate getting the written responses to you by tomorrow. As you note, if supplemental responses become necessary, we will supplement accordingly. Given the shear number of Plaintiff's requests, we still appreciate the patience.

Thanks,

Stephen

Stephen M. Bosak | DGMP | 440.930.4001

From: Brian Bardwell <bri> speech.law>

Sent: Monday, June 3, 2024 4:48 PM

To: Stephen Bosak <sbosak@dooleygembala.com>

Cc: Matthew Dooley <mdooley@dooleygembala.com>; Michael Briach <mbriach@dooleygembala.com>; Amy

Joyce <ajoyce@dooleygembala.com>

Subject: Re: Williamson v. Lorain County, et al. - Defendants' Discovery Responses

Hi, Stephen.

Given Defendants' attempt to grant themselves an open-ended extension on discovery with only an aspirational deadline for compliance, we are disappointed that our request for at least their written responses is being ignored.

Please send them along. We understand that providing them timely may mean that you need to supplement them later on.

Please also see our filings from today, which are at

PLAINTIFF'S EXHIBIT

18

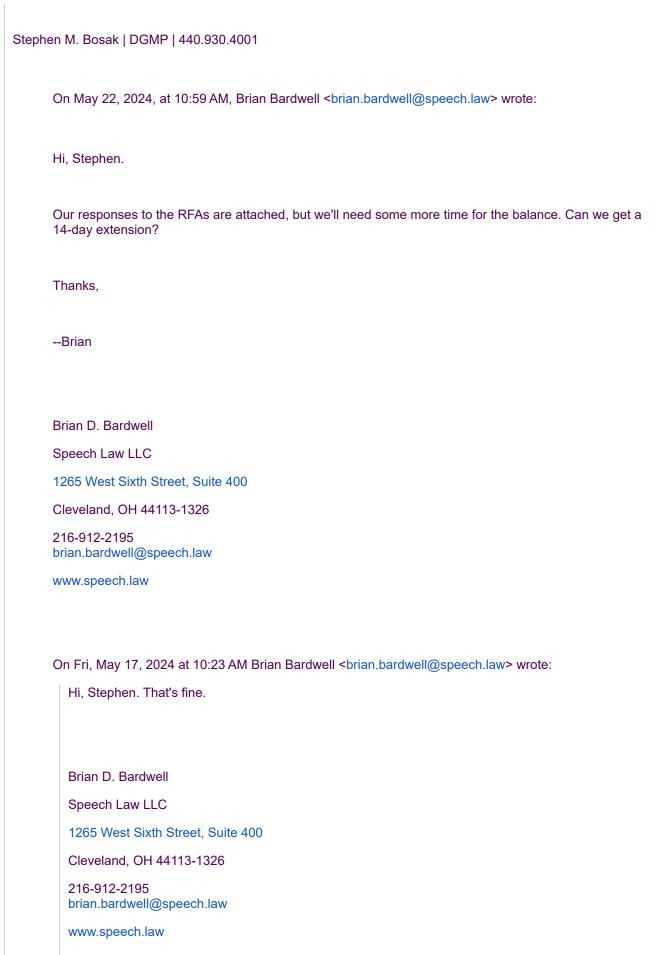
216-912-2195 brian.bardwell@speech.law www.speech.law On Thu, May 30, 2024 at 9:47 PM Brian Bardwell <a href="mailto:speech.law">brian.bardwell@speech.law</a> wrote: Hi, Stephen. Please send the written responses in the meantime. Thanks, -- Brian On Thu, May 30, 2024, 9:27 PM Stephen Bosak <sbosak@dooleygembala.com> wrote: Brian: We're still sifting through potential responsive documents, which is delaying our ability to respond, so we'll need some additional time. My expectation is that we have responses to you by early/middle of next week and will start a rolling production at that time to. I'll keep you updated on our progress. Thanks, Stephen Stephen M. Bosak | DGMP | 440.930.4001 From: Stephen Bosak Sent: Wednesday, May 22, 2024 5:30 PM To: Brian Bardwell <a href="mailto:brian.bardwell@speech.law">brian.bardwell@speech.law</a> Cc: Matthew Dooley <mdooley@dooleygembala.com>; Michael Briach <mbriach@dooleygembala.com>; Amy Joyce <ajoyce@dooleygembala.com> Subject: Re: Williamson v. Lorain County, et al. - Defendants' Discovery Responses No objection.

Case: 1:23-cv-01507-JG Doc #: 43-1 Filed: 09/30/24 2 of 4. PageID #: 857

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Case: 1:23-cv-01507-JG Doc #: 43-1 Filed: 09/30/24 4 of 4. PageID #: 859

On Thu, May 16, 2024 at 11:43 AM Stephen Bosak <sbosak@dooleygembala.com> wrote:</sbosak@dooleygembala.com>
Brian:
Defendants need additional time to respond to Plaintiff's discovery requests. Any objection to a 14-day extension on our responses?
Thanks,
Stephen
Stephen M. Rosak I DCMP I 440 030 4001
Stephen M. Bosak   DGMP   440.930.4001

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<2024-05-22 Williamson responses to Lorain County RFAs.pdf>